

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

Bryan Anthony Reo, ) Case No. 3:15-CV-2348  
Plaintiff, ) Hon. \_\_\_\_\_  
v. ) **NOTICE OF REMOVAL**  
AffAction, LLC, d/b/a Seniorcare.com, ) Roman Arce (0059887)  
et al., ) Jennifer J. Dawson (0033707)  
Defendants. ) **MARSHALL & MELHORN, LLC**  
 ) Four SeaGate, 8th Floor  
 ) Toledo, Ohio 43604  
 ) (419) 249-7100  
 ) FAX (419) 249-7151  
 ) dawson@marshall-melhorn.com  
 ) Counsel for Defendants  
 ) AffAction, LLC, d/b/a Seniorcare.com and  
 ) Shawn Schulze  
)

1. On November 5, 2015, AffAction, LLC, doing business as Seniorcare.com and Shawn Schulze received a Summons and Complaint captioned *Bryan Anthony Reo v. AffAction, LLC, d/b/a/ Seniorcare.com, et al.*, Case No. 15 CV 001840 pending in the Common Pleas Court of Lake County.

2. Copies of the Summons and Complaint are attached hereto as Exhibits A and B.

3. This Notice of Removal is filed within 30 days after receipt of the Summons and Complaint by Defendants and it is therefore timely filed in accordance with 28 U.S.C. §1446(b).

4. The Summons and Complaint represent all process and pleadings served upon Defendants in this case.

5. This Court has original jurisdiction over this action because Plaintiff alleges that Affaction violated the Telephone Consumer Protection Act, 47 U.S.C. §227 *et seq.* (Complaint at paragraph 1). Therefore, this action may be removed to this Court pursuant to 28 U.S.C. §§1331 and 1446.

6. A copy of this Notice of Removal will be filed with the Clerk of the Court for the Common Pleas Court of Lake County and served on Plaintiff.

WHEREFORE, Defendants AffAction, LLC, doing business as Seniorcare.com and Shawn Schulze respectfully request that this matter proceed in this Court as though originally commenced herein.

Respectfully submitted,

/s/ Jennifer J. Dawson

Roman Arce  
Jennifer J. Dawson  
Attorney for Defendants  
AffAction, LLC, d/b/a Seniorcare.com and  
Shawn Schulze

#### CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2015, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the United States District Court's electronic filing system and via email to [brett1066@gmail.com](mailto:brett1066@gmail.com) and regular U.S. mail to Brett A. Klimkowsky, Esq., P.O. Box 114, Martin, OH 43445, Attorney for Plaintiff.

/s/ Jennifer J. Dawson

Jennifer J. Dawson